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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 SCOTT BULLIS,
15 Defendant.

Case No. 2:18-cr-00224-RFB-NJK

**DEFENDANT'S UNOPPOSED
MOTION FOR PERMISSION TO
TRAVEL OUT OF THE DISTRICT**

17 Defendant Scott Bullis asks the Court to modify the conditions of his pretrial release to
18 allow him to travel with his wife and daughters to Utah on July 17, 2020 through July 20, 2020.
19 Title 18, United States Code, Section 3142(c)(3) provides that a "judicial officer may at any
20 time amend the order to impose additional or different conditions of release." The Pretrial
21 Services does not oppose this request. The Office of the US Attorney has stated that they will
22 defer to the Court and Pretrial Services.

23 **Background**

24 On July 13, 2018, Scott Bullis was charged by Complaint with one count of Felon in
25 Possession of Firearm. ECF No. 1. He made his initial appearance on July 17, 2018, and was
26 released on conditions, including the restriction of his travel to the District of Nevada. ECF No.

1 3. On July 25, 2018, a grand jury indicted Mr. Bullis on the same charge. ECF No. 12.

2 On August 20, 2019, Mr. Bullis entered a guilty plea to a criminal information without
3 the benefit of a plea bargain. ECF No. 43-45. On January 9, 2020, the Court conducted a
4 sentencing hearing. ECF No. 52. The sentencing was continued in order to prepare and submit
5 an expert report regarding. *Id.* Sentencing is currently set for August 5, 2020. ECF No. 60.

6 **Argument**

7 Mr. Bullis was on release pending trial for almost two years. He has been on release
8 pending sentencing for almost a year. He previously traveled to California to visit family and
9 to Zion National Park and returned successfully without incident. ECF Nos. 39, 62. During his
10 entire time on supervision, he has not tested positive for drugs, had any adverse law
11 enforcement contacts, or otherwise failed to comply with the terms of his release.

12 Mr. Bullis works long hours. He has been very successful, being promoted repeatedly.
13 He works closely with local law enforcement. Mr. Bullis has been actively participating in
14 counseling and treatment for his depression arising from the loss of his son. He has cooperated
15 fully with his Probation Officer.

16 As the Court knows, Mr. Bullis became a father twice while on pretrial release. His
17 daughter, Jalissa, was born on February 25, 2019, and his youngest daughter, Angelina, born
18 April 29, 2020. Mr. Bullis and his family request permission to travel to Utah to camp at Sand
19 Hallow Beach from July 17, 2020, through July 20, 2020.

20 Mr. Bullis requests permission from the Court to drive to Utah with his family for
21 relaxation and to celebrate his wife's birthday. They would camp at Sand Hallow Beach State
22 Park, returning to Nevada on July 20, 2020. Mr. Bullis will work with probation, providing the
23 address and itinerary. This time together as a family will assist in strengthening the family
24 bond, which will be pivotal both in assisting Mr. Bullis in reintegrating into society if he is
25 subject to a custodial sentence.

Conclusion

For the foregoing reasons, Mr. Bullis requests the Court's permission to travel with his family to Utah from July 17, 2020, through July 20, 2020, pursuant to 18 U.S.C. § 3142(c)(3).

DATED this 2nd day of July, 2020.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/ Kathryn C. Newman
By _____

KATHRYN C. NEWMAN
Assistant Federal Public Defender

ORDER

IT IS SO ORDERED.



RICHARD F. BOUWARE, II
United States District Judge

Dated: July 13th , 2020.

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on July 2, 2020, she served an electronic copy of the above and foregoing **DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL OUT OF THE DISTRICT** by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH
United States Attorney
ALLISON REESE
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Marlene Mercado
Employee of the Federal Public Defender